

**Review of Paulozzi, LJ, et al, “Lack of Evidence that Prescription Drug Monitoring Programs Decrease Deaths from Opioid Overdose”**

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**Are the study objectives clearly stated and appropriate? (Yes, No, Unsure) Why?**

Yes

**Is the overall study design appropriate for the study objectives? (Yes, No, Unsure) Why?**

Yes

**Are the methods and analysis plan appropriate for the study objectives? (Yes, No, Unsure) Why?**

Yes

**Were the data analyzed in such a way to address the objectives of the study appropriately? (Yes, No, Unsure) Why?**

Yes

**Are the study results presented and interpreted appropriately and completely? (Yes, No, Unsure) Why?**

Yes

**Are the study conclusions, policy implications, and recommendations appropriate and complete? (Yes, No, Unsure) Why?**

Yes

## Are there any other comments on the report?

p.4, PDMPs – The Harold Rogers’ program is officially named the Harold Rogers Prescription Drug Monitoring Program. The first grants were awarded in fiscal year (FY) 2003. <http://www.ojp.usdoj.gov/BJA/grant/prescripdrugs.html>

p.6, ARCOS – Which ARCOS data were used (i.e. cumulative distribution, retail distribution, retail distribution to pharmacies)?

p.7, Hydrocodone Schedule III – I suggest stating that state PDMPs vary regarding the collection of Schedule III data.

p.11, Are any additional reasons, other than operating some of the oldest PDMPs in the country and the use of special prescription forms, attributed to CA, NY, and TX having lower rates of opioid prescribing?

p.11, Tamper-proof prescription forms – The CA forms changed in 2005. According to information on the CA state government website, prior to 2005, the forms were not single-copy, but triplicate.

**California Senate Bill 151** repeals a longstanding requirement for state-issued triplicate prescription forms. As of July 1, 2004, the Department of Justice will no longer produce or distribute triplicate prescription forms. In place of the triplicate, prescribers will use a tamper-resistant prescription pad available from private printing companies that have been approved by the Board of Pharmacy and Department of

Justice([http://www.pharmacy.ca.gov/consumers/prescribe\\_dispense.htm#timeline](http://www.pharmacy.ca.gov/consumers/prescribe_dispense.htm#timeline)).

### **Triplicates Out - New Tamper-Resistant Security Prescriptions In!**

The triplicate prescription form required to prescribe Schedule II medications is being replaced. On January 1, 2005, all written controlled substance prescriptions (for Schedules II-V) must be on the new, tamper-resistant prescription form ([http://www.pharmacy.ca.gov/consumers/prescribe\\_dispense#triplicates](http://www.pharmacy.ca.gov/consumers/prescribe_dispense#triplicates)).

I am not an expert on prescription forms, but I am curious regarding the use/non-use/consistency of specific prescription forms by state during the study’s time frame, 1999-2005.